



2500
Brown & Williamson
Tower
Louisville, Kentucky
40202
502.584.1135
502.561.0442 fax
www.middreut.com

Douglas F. Brent
Direct dial: 502-625-2771
dbrent@middreut.com

October 8, 2003

RECEIVED
OCT - 9 2003
PUBLIC SERVICE
COMMISSION

Mr. Thomas M. Dorman
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40601

RE: Case No. 2003-00379

Dear Mr. Dorman:

Enclosed please find the original and ten copies of Covad Communications Company's ("Covad") Motion for Full Intervention. Please indicate receipt of this filing by your office by placing a file stamp on the extra copy and returning to me via the enclosed, self-addressed, stamped envelope.

Sincerely Yours,

Douglas F. Brent
Counsel to Covad Communications Company

DFB:jms

Enc.

Cc: Parties of Record

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
OCT - 9 2003
PUBLIC SERVICE
COMMISSION

In the Matter of:

REVIEW OF FEDERAL COMMUNICATIONS)
COMMISSION'S TRIENNIAL REVIEW ORDER) CASE NO. 2003-00379
REGARDING UNBUNDLING REQUIREMENTS)
FOR INDIVIDUAL NETWORK ELEMENTS)

COVAD'S MOTION FOR FULL INTERVENTION

Pursuant to 807 KAR 5:001, Section 3(8) and Ordering paragraph 1 of the Order issued October 2, 2003, in the above-captioned proceeding, Dieca Communications, Inc. d/b/a Covad Communications Company ("Covad") submits this motion for full intervention in the above-captioned proceeding.

Covad is a utility authorized to provide competitive services in Kentucky. As a competitive local carrier ("CLEC"), Covad has a direct interest in the Section 251 unbundling obligations of incumbent local exchange carriers, and intends to participate in this matter. Covad's participation is likely to present issues that will assist the Commission without unduly complicating the proceeding.

A copy of this motion is being sent to the Attorney General and to the incumbent local exchange carriers identified in paragraph four of the Commission's Order. Any future pleadings will be served upon parties or as the Commission may otherwise direct.

Covad requests that all pleadings and other documents be served upon:


C. Kent Hatfield
Douglas F. Brent
Middleton Reutlinger
2500 Brown & Williamson Tower
Louisville, KY 40202

and

Charles (Gene) Watkins
Senior Counsel
Covad Communications Company
1230 Peachtree Street, NE, 19th Floor
Atlanta, GA 30309

For the reasons stated above, Covad asks that this Motion for Full Intervention be granted.

Respectfully submitted,

By: 

C. Kent Hatfield
Douglas F. Brent
MIDDLETON REUTLINGER
2500 Brown & Williamson Tower
Louisville, KY 40202
(502) 584-1135

Counsel for Covad Communications Company

CERTIFICATE OF SERVICE

This is to certify that I have this 8th day of October, 2003 caused to be served by United States mail a copy of the within and foregoing Motion to Intervene upon the following persons, properly addressed as follows:



Douglas F. Brent

Stephen R. Byars
Vice President – External Affairs
ALLTL Communications, Inc
P.O. Box 1650
Lexington, Kentucky 40588-1650

Hon. Ann Louise Cheverout
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40601-8204

Dorothy Chambers
Regulatory & External Affairs
BellSouth Telecommunications, Inc.
601 West Chestnut Street, Room 410
P.O. Box 32410
Louisville, Kentucky 40232

Jouett Kinney
Cincinnati Bell
201 East 4th Street
Building 103-1610
Cincinnati, Ohio 45201